

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

ALL IN JETS, LLC, d/b/a JETREADY,

Debtor.

Chapter 11

Case No. 20-11831 (MEW)

**NOTICE OF APPEARANCE, REQUEST FOR
SERVICE, AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE that Wachtel Missry LLP hereby appears in the above-captioned case pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) as counsel to Seth A. Bernstein, a/k/a Seth M. Bernstein (“Bernstein”), Bernstein Equity Partners, LLC, SMB Air LLC, SMB Aircraft LLC, SMB Challenger I, LLC, SMB GIII, LLC, SMB G-IV, LLC, SMB G-IV I LLC, SMB G-IV II, LLC, SMB G-IV III, LLC, SMB G-IV IV, LLC, SMB G-IV V, LLC, SMB G-IV VI, LLC, SMB G-IV VII, LLC, SMB G-IV IX, LLC, SMB G-IV XI, LLC, and 917MS LLC (collectively, the “Bernstein Entities”), and requests, pursuant to Bankruptcy Rules 2002, 9007, and 9010 and sections 102(1), 342 and 1109(b) of chapter 11, title 11 of the United States Code (the “Bankruptcy Code”), that all notices given or required to be given in this case and all papers served or required to be served in this case be given to and served upon the undersigned at the following office address, telephone numbers and e-mail addresses:

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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, facsimile transmission, e-mail or otherwise, which affect the Debtor, the Trustee, or property of the Debtor or the Debtor's estate.

This Notice of Appearance and Request for Service of Papers (the "Notice") shall not be deemed or construed to be a waiver of any of Bernstein or the Bernstein Entities' rights, substantive or procedural, including, without limitation: (1) the right to have final orders in non-core matters entered only after *de novo* review by a District Court Judge, (2) the right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) any other rights, claims, actions, setoffs, or recoupments to which any of Bernstein or the Bernstein Entities is or may be entitled, at law or in equity, each and all of which are expressly reserved, and (5) any defenses or objections any of Bernstein or the Bernstein Entities may have to any claims asserted against any one or more of them, including, without limitation, any defense based on insufficient service of process, jurisdiction (including personal jurisdiction), or capacity to be sued. Bernstein and the Bernstein Entities do not consent, and nothing in this Notice shall be deemed or construed as consent from any one or more of them, to the entry of final orders or judgments by this Court, if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: New York, New York
February 22, 2023

WACHTEL MISSRY LLP

By: /s/Steven J. Cohen

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